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MEMO ENDORSED

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June 14, 2022

By Electronic Case Filing

Honorable Kenneth M. Karas  
United States District Judge  
United States District Court  
for the Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601-4150

Re: Teamsters Local 456 Pension, Health & Welfare, Annuity, Education &  
Training, Industry Advancement, and Legal Services Funds et al v. K & D  
Aggregates Inc et al, Civil Action No. 7:21-cv-09318-KMK

Dear Judge Karas:

We represent Plaintiffs in the above-referenced matter.

We write to respectfully request an approximate forty-five (45) day extension of time to file a default motion. In short, if granted, the new motion filing deadline would be July 1, 2022.

We make this request for two reasons: (a) settlement discussions remain ongoing and (b) Plaintiffs are transitioning to new counsel. As such, to allow new counsel (which likely will be moving to be substituted in on consent within the coming week) to review the case file and engage in the ongoing settlement discussions, this request is made.

We thank the Court for its consideration of this matter.

Granted. The Default Motion is due 8/1/22.

Very truly yours,

*Michael S. Adler*

Michael S. Adler

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